

## REMARKS

Claims 1-33 are pending in the present application.

Claims 1-4, 6-9, 11-13, 16-19, 21-24, 26-28 and 31-33 stand rejected under 35 U.S.C. 102(b) as being anticipated by Christiansen (U.S. Patent No. 5,915,253) (hereinafter 'Christiansen'). Applicant respectfully traverses these rejections.

Claims 5, 10, 14, 15, 20, 25, 29 and 30 stand rejected under 35 U.S.C. 103(a) as unpatentable over Christiansen in view of Napolitano et al. (U.S. Patent No. 6,219,693) (hereinafter 'Napolitano').

Applicant discloses at page 8 line 28 through page 9 line 2 “The files in a given directory may be allocated to different volumes based on the storage characteristics desired for each file, but the files may still logically reside in the same directory.” (Emphasis added).

Accordingly, Applicant's claim 1 recites a data storage system comprising in pertinent part, “wherein said file system includes a directory structure having an entry corresponding to a file maintained by said file system, and wherein said entry includes a field containing a volume identifier indicative of which of said first or said second volumes said file is stored within.” (Emphasis added).

Christiansen is directed to a method and system for implementing objects in a storage system. At col. 5, lines 52-55, Christiansen discloses “Storage system 24 includes object table 40 which contains a plurality of references to in-memory objects. Object table 40 in a preferred embodiment is a hash table.”

The Examiner asserted that the Applicant's directory structure reads on the object table of Christiansen. Applicant disagrees with the Examiner's characterization.

Since the hash table of Christiansen does not include an entry corresponding to a file maintained by said file system, and wherein said entry includes a field containing a volume identifier indicative of which of said first or said second volumes said file is stored within, the Applicant's directory structure does not read on Christiansen's object table.

Furthermore, Christiansen discloses directories at col. 12, lines 11-22

"A volume object includes volume metadata as well as volume object data. Volume metadata 192 includes volume data reference 194 which is a pointer to the volume object data associated with volume object 180. A volume object's data comprises the objects owned by that volume. Directories of the names of objects can be implemented in a container object which maintains the name of the objects of a particular directory in a hierarchical tree. For example, **volume data 196 includes object 26, object 30, and object 34.** Thus, by maintaining a reference to a particular volume one can access each object associated with that volume."

From the foregoing, Christiansen does not teach or disclose "wherein said file system includes a directory structure having an entry corresponding to a file maintained by said file system, and wherein said entry includes a field containing a volume identifier indicative of which of said first or said second volumes said file is stored within as recited in Applicant's claim 1.

Napolitano is directed to a file array storage architecture having file system distributed across a data processing platform. Applicant can find no reference in Napolitano to a directory structure having an entry corresponding to a file maintained by said file system, and wherein said entry includes a field containing a volume identifier indicative of which of said first or said second volumes said file is stored within as recited in Applicant's claim 1.

Thus, neither Christiansen nor Napolitano, teach or suggest the combination of features as recited in Applicant's claim 1.

Accordingly, Applicant respectfully submits that claim 1, along with its dependent claims, patentably distinguishes over Christiansen and over Christiansen in view of Napolitano.

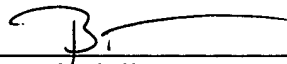
Likewise, claims 6, 11, 16, 21, 26, 31 and 33 recite features similar to claim 1. Thus, Applicant believes that claims 6, 11, 16, 21, 26, 31 and 33, along with their respective dependent claims, patentably distinguish over Christiansen and over Christiansen in view of Napolitano for at least the reasons given above.

**CONCLUSION**

Applicants submit the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-59200/BNK.

Respectfully submitted,

  
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